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ATTORNEYS FOR
DEFENDANT NETFLIX, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BROADCOM CORPORATION *et al.*,

Plaintiffs,

v.

NETFLIX, INC.,

Defendant.

Case No. 3:20-cv-04677-JD

**JOINT STIPULATION FOR EXTENSION
OF TIME AND ~~[PROPOSED]~~ ORDER**

Dept.: Courtroom 11, 19th Floor
Judge: Honorable James Donato

Date Filed: March 13, 2020

Trial Date: February 12, 2024

Pursuant to Local Rules 6-2 and 7-12, Plaintiffs Broadcom Corporation and Avago Technologies International Sales PTE. Limited (“Broadcom”) and Defendant Netflix, Inc. (“Netflix”) (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and request as follows:

SHOWING OF GOOD CAUSE

WHEREAS, the current Court-ordered schedule sets August 18, 2023 as the deadline for lead trial counsel to meet and confer re: preparation of joint pretrial materials;

WHEREAS, unmovable conflicts prevent Broadcom’s and Netflix’s lead counsel from meeting and conferring on that day;

WHEREAS, the Parties have identified August 30, 2023 as a mutually agreeable day on which lead counsel is available to meet and confer re: preparation of joint pretrial materials;

WHEREAS, the Parties agree that, in light of the foregoing, the deadline for lead trial counsel to meet and confer re: preparation of joint pretrial materials should be extended to August 30, 2023;

WHEREAS, the current Court-ordered schedule sets November 23, 2023 as the deadline for the Parties to exchange (but not file with the Court) exhibits and exhibit lists;

WHEREAS, November 23, 2023 is Thanksgiving Day;

WHEREAS, the Parties agree that, in light of the foregoing, the deadline for the Parties to exchange (but not file with the Court) exhibits and exhibit lists should be moved to November 21, 2023;

WHEREAS, the current Court-ordered schedule sets December 26, 2023 as the deadline for Pretrial filings;

WHEREAS, December 26, 2023 is the day after Christmas Day;

WHEREAS, the Parties agree that, in light of the foregoing, the deadline for Pretrial filings should be moved up earlier to December 22, 2023, which is the Friday before Christmas Day;

WHEREAS, the Court’s Scheduling Order will otherwise remain unchanged;

NOW THEREFORE, the Parties respectfully request that this Court order the following

modification to the Scheduling Order:

Event	Current Deadline	Proposed Deadline
Lead trial counsel to meet and confer re: preparation of joint pretrial materials	August 18, 2023	August 30, 2023
Deadline to file reply briefs to dispositive and <i>Daubert</i> motions	August 25, 2023	<i>Unchanged</i>
Exchange of deposition and discovery response designations (not filed with the Court)	September 22, 2023	<i>Unchanged</i>
Exchange counter-designations and objections to deposition and discovery-response designations (not filed with the Court)	October 13, 2023	<i>Unchanged</i>
Exchange exhibits and exhibit lists (not filed with the Court)	November 23, 2023	November 21, 2023
Exchange objections to exhibit lists (not filed with the Court)	December 7, 2023	<i>Unchanged</i>
Exchange witness lists (not filed with the Court)	December 7, 2023	<i>Unchanged</i>
Parties exchange motions <i>in limine</i> (not filed with the Court)	December 14, 2023	<i>Unchanged</i>
Parties exchange oppositions to motions <i>in limine</i> (not filed with the Court)	December 21, 2023	<i>Unchanged</i>
Pretrial filings	December 26, 2023	December 22, 2023
Pretrial conference	January 25, 2024, at 1:30 p.m.	<i>Unchanged</i>
Parties to file deposition and discovery designations,	February 1, 2024	<i>Unchanged</i>

including counter-designations and objections		
Jury Trial	February 12, 2024, at 9:00 a.m.	Unchanged

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: August 18, 2023


HONORABLE JAMES DONATO
UNITED STATES DISTRICT JUDGE

KEKER, VAN NEST & PETERS LLP

/s/ Richard L. Wynne

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/s/ Sharif E. Jacob

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ATTESTATION

In accordance with Civil Local Rule 5-1(h)(3), I attest that each of the signatories have concurred in the filing of this document.

Dated: August 18, 2023

By: /s/ Sharif E. Jacob

Sharif E. Jacob